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Attorneys for Plaintiffs/Applicants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

<p>IN RE MOTION TO COMPEL COMPLIANCE WITH RULE 45 SUBPOENA ISSUED TO ETHICARE ADVISORS, INC.</p>	<p>Civil Action No. 2:20-cv-01886</p> <p>NOTICE OF MOTION TO COMPEL COMPLIANCE WITH RULE 45 SUBPOENA ISSUED TO ETHICARE ADVISORS, INC.</p> <p><i>DOCUMENT FILED ELECTRONICALLY</i></p>
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PLEASE TAKE NOTICE that Plaintiffs/Applicants Star Dialysis, LLC, Ordust
Dialysis, LLC, Routt Dialysis, LLC, Panther Dialysis, LLC, and DaVita Inc. (collectively,

“Plaintiffs” or “DaVita”), by and through their undersigned counsel, shall move before the United States District Court for the District of New Jersey on March 16, 2020 at 9:00 a.m., or as soon thereafter as may be heard, for an order compelling EthiCare Advisors, Inc. (“EthiCare”) to produce documents pursuant to the Subpoena served on EthiCare on November 22, 2019 in the matter captioned *Star Dialysis, LLC, et al. v. WinCo Foods Employment Benefit Plan, et al.*, Docket No. 1:18-cv-00482-EJL-CWD, venued in the United States District Court for the District of Idaho. Plaintiffs make this application in this Court as the Subpoena, pursuant to Rule 45(c)(2)(A), required that EthiCare produce documents within 100 miles where it regularly transacts business and, in particular, at 301 Carnegie Center, Suite 400, Princeton, NJ 08543-5276.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs submit the accompanying Memorandum of Law and Declaration of Jennifer S. Lewin, Esq. (with Exhibits thereto).

Plaintiffs respectfully request oral argument on this motion to compel.

A proposed order is included for the Court’s convenience.

Respectfully submitted,

/s/ Jeffrey A. Carr

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Dated: February 21, 2020